

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ECF
07 CV 2889 (AKH)

ROYAL & SUN ALLIANCE INSURANCE, PLC, Plaintiff, -vs- OCEAN WORLD LINES, Defendant & Third Party Plaintiff, vs. YANGMING MARINE TRANSPORT CORP. and DJURIC TRUCKING, INC., Third Party Defendants.
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TABLE OF CONTENTS OF
SUBMISSIONS OF THIRD PARTY
DEFENDANTS, YANG MING
MARINE TRANSPORT CORP.
AND DJURIC TRUCKING, INC. IN
SUPPORT OF THEIR MOTION TO
DISMISS OR LIMIT LIABILITY

Notice of Motion

Moving Memorandum of Law

<i>Addendum 1:</i>	Selected YMTC Sea Waybill Terms and Conditions
<i>Addendum 2:</i>	Selected OWL Bill of lading Terms and Conditions
<i>Addendum 3:</i>	Slip Opinion in <i>Nippon Express v. M/V CHANG JIANG BRIDGE</i> , 06 CV 694 (PKC) (S.D.N.Y.)

Moving Declaration of Paul M. Keane

<i>Moving Exhibit AA:</i>	The complaint
<i>Moving Exhibit BB:</i>	The third party complaint.
<i>Moving Exhibit CC:</i>	The third party defendants' answer to the complaint.
<i>Moving Exhibit DD:</i>	The third party defendants' answer to the third party complaint.

- Moving Exhibit EE:* The face of the YMTC sea waybill covering the shipment sued on.
- Moving Exhibit FF:*
1. The reverse side terms and conditions of the YMTC sea waybill covering the shipment sued on.
 2. A more legible copy of Moving Exhibit FF-1 taken from the YMTC web site at <https://www.YMTC.com.tw/tariff/tariff.html>
- Moving Exhibit GG:* Page from web site maintained by defendant & third party plaintiff, OWL at <http://www.owlusa.com/>.
- Moving Exhibit HH:* The face of bill of lading issued by OWL for the subject shipment. This document is taken from plaintiff's Rule 26 production.
- Moving Exhibit II:* Reverse side terms and conditions of the bill of lading issued by OWL for the subject shipment. This document is also taken from plaintiff's Rule 26 disclosure.
- Moving Exhibit JJ:* Service contract between OWL as shipper and YMTC as ocean carrier.

Moving Declaration of Richard Cribari

- Moving Exhibit KK:* DJURIC / YMTC Rate Schedule

Reply Memorandum of Law

- Addendum 4:* "Exemption Of Freight Forwarders In The Noncontiguous Domestic Trade From Rate Reasonableness And Tariff Filing Requirements," n.3 (Docket Number: EP_598_0) (STB 1997)

Supplemental Declaration of Richard Cribari

- Reply Exhibit LL:* Cartage receipt

Reply Declaration of Paul M. Keane

Reply Exhibit MM:

Excerpt from THE MARITIME LAW ASS'N OF
THE U.S., Spring Meeting – May 3, 1996, Doc. No.
723

Dated: New York, NY

Jan. 30, 2008

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Attorneys for the Third Party Defendants

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